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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARTIN ERIC FINDLEY,

Plaintiff,

vs.

CAROLYN W. COLVIN,
Acting Commissioner of
Social Security,

Defendant.

CIVIL NO. 5:14-CV-03581-BLF

STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT'S
TIME TO FILE A RESPONSE TO
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT AND
MEMORANDUM OF POINTS AND
AUTHORITIES

(Defendant's Second Extension Request)

Defendant Carolyn W. Colvin, Acting Commissioner of the Social Security Administration ("Defendant") respectfully request the Court to extend the time for Defendant to file her response to Plaintiff's Motion For Summary Judgment and Memorandum of Points and Authorities, due on July 30, 2015, by 14 days, through and including August 13, 2015.

Pursuant to Civil L.R. 6-2, the undersigned states the following:

(1) Defendant's counsel has contacted the client agency, which is the Office of Disability Adjudication and Review, Appeals Council in writing to explore settlement options.

(2) The client has informed me that they are in the process of considering the defensibility of this case and need additional time to complete their review. I expect a response within two weeks, and will need further time to consult with opposing counsel.

Stipulation re: extension, 5:14-cv-03581-BLF

1 (3) Plaintiff's Reply brief, if necessary will be due on August 27, 2015.

2 (4) Plaintiff has had one extension of the briefing schedule of 28 days, and an extension of 45
3 days for service of the summons by U.S. Marshall. Defendant has had one extension of the briefing
4 schedule of 28 days.

5 (5) Pursuant to the Court's scheduling order (ECF Doc. #3), the matter will be submitted for
6 decision without oral argument, thus an extension of time will not require vacating a hearing date.

7 (6) Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to the
8 requested extension on July 23, 2015.

9 (7) This request is made in good faith with no intention to unduly delay the proceedings.

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12 Respectfully submitted,

13 MELINDA L. HAAG
14 United States Attorney

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16 Dated: July 24, 2015

By: /s/Richard M. Rodriguez
17 RICHARD M. RODRIGUEZ
18 Special Assistant United States Attorney
Attorney for Defendant

19 Dated: July 24, 2015

/s/Lisa S. Douglass
20 Attorney for Plaintiff*
21 (*by email authorization on June 23, 2015)